



**HARRIS CORPORATION**

**Government Relations**  
600 Maryland Avenue, S.W.  
Suite 850E  
Washington, D.C. 20024  
phone 1-202-729-3700  
fax 1-202-729- 3735

[www.harris.com](http://www.harris.com)

July 17, 2012

*Via Electronic Filing*

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Allowing Operations of Early Public Safety Broadband Deployments in Discreet Areas, Docket Nos. PS 06-229, PS 12-94

Dear Chairman Genachowski:

On behalf of Harris Corporation (Harris) I write to applaud your ongoing work to ensure that our nation is equipped with an interoperable, multi-vendor-built nationwide public safety broadband network (NPSBN). Your tireless effort and dedication, and that of your colleagues and staff, have set the stage for making this goal a reality. In this crucial time, we support you in your efforts to ensure that the NPSBN can be built through a competitive model that maximizes efficiency of scale, commercial procurement practices, and nonproprietary technologies.

To that end, recent reports indicate that the Commission is considering an Order that could, overall, provide FirstNet an environment in which it can implement, in accordance with the provisions of H.R. 3630, a competitive procurement process that will not require building around large-scale existing and operational - or yet-to-be-built - networks or infrastructure. Specifically, it appears that existing operations in areas of the City of Charlotte, NC, and Harris County, TX, are identified as candidates for approval for operational use of these networks. Harris believes that such discreet networks, if conclusively proven to be interoperable and limited to operation within the boundaries of the City of Charlotte, NC, and Harris County, TX and the capacity of the existing, currently-deployed infrastructure therein, will not overwhelmingly inhibit FirstNet's ability to realize our shared goal of a truly interoperable NPSBN.

However, the allowance of larger, more numerous networks in various states of build out will minimize FirstNet's ability to ensure that a competitive environment drives a successful, cost-efficient, and interoperable network. Thus, Harris believes that extending authorization for build out or operational use beyond such confined areas should not be allowed at this time.

Moreover, conclusive proof of interoperability must be determined based upon testing and certification. If non interoperable networks are allowed by the Commission to be early deployed, FirstNet will face the burden of leveraging such networks, thereby limiting competition and cost efficiency, or requiring that these networks be shut down.

To prevent FirstNet being faced with such undesirable options, Harris suggests that both of these networks seeking early deployment be required to certify interoperability through the Public Safety

Communications Research Program's Phase 3 testing for multi-vendor interoperability as condition of Commission authority and FirstNet consent for Special Temporary Authority.

Once again, Harris thanks you and the Commission for your dedication to ensuring a competitively-built, truly interoperable NPSBN. Harris stands ready to assist the Commission in achieving these goals and assist the Commission and FirstNet going forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Marschilok". The signature is fluid and cursive, with the first name "Steve" written in a larger, more prominent script than the last name "Marschilok".

Steve Marschilok  
President  
Public Safety and Professional Communications

Attachment

CC:

David Turetsky  
Genaro Fullano  
Anna M. Gomez  
Angela Simpson  
Dan Phythyon

